

February 28, 2019

The Honourable Ginette Petitpas Taylor, P.C., M.P.
Minister of Health
House of Commons Ottawa, Ontario
K1A 0A6

Subject: Re-evaluation of imidacloprid - Scientific evidence of insect declines requires prompt action to end use of neonicotinoids

Dear Minister Petitpas Taylor,

As environmental and conservation organizations working to protect biodiversity, we are deeply concerned by the delay in the re-evaluation decision regarding the neonicotinoid insecticide imidacloprid. Health Canada's Pest Management Regulatory Agency was scheduled to publish the final decision in December 2018¹, but has yet to do so. We ask you to finalize the decision as soon as possible and to cancel immediately major uses, to avoid prolonging unacceptable risks to the environment.

As you know, the proposed re-evaluation decision, published in November 2016, concluded that imidacloprid posed unacceptable risks to the environment and the Pest Management Regulatory Agency (PMRA) therefore proposed to phase out most uses of imidacloprid. The ecological risk assessment found that, in aquatic environments in Canada, imidacloprid is being measured at levels that are harmful to aquatic insects, and that the continued use of imidacloprid in agricultural areas is not sustainable. These insects are an important part of the ecosystem, including as a food source for fish, birds and other animals, and as predators of pests.

¹ Pest Management Regulatory Agency. 2018. *Re-evaluation and Special Review Work Plan 2018-2023*. Re-evaluation Note REV2018-06. Available at: <https://www.canada.ca/content/dam/hc-sc/documents/services/consultation/REV2018-06-eng.pdf>

Yet more than two years later, the Government of Canada has yet to take any meaningful action to curb the use of imidacloprid as well as other neonicotinoids, which is expected to result in similar effects should use of substitute systemic insecticides increase. The ongoing delay prolongs the identified risks to the environment unjustifiably.

This issue requires urgent action. Global insect biodiversity is in precipitous decline. A comprehensive international review published in 2019, in the journal *Biological Conservation*² reveals that dramatic rates of decline in both terrestrial and aquatic insect species may lead to the extinction of more than 40% of the world's insect species over the next few decades, and one third becoming endangered. These findings are very alarming given that insects are essential for the functioning of all ecosystems, as food for other creatures, pollinators, predators of undesired "pest" species, and recyclers of nutrients. The study identifies agricultural pesticides as a contributing factor. Pollinators are responsible for many colourful fruits and vegetables³, that are central to a nutritious diet and to public health.

We are aware that Health Canada's scientifically-based proposal to phase out imidacloprid and other neonicotinoids elicited significant opposition from the manufacturers and marketers of these chemicals and agricultural stakeholders. Industry influence must not be allowed to interfere with the final decisions or further delay action necessary to protect the environment.

Leading jurisdictions have recognized the urgency of this issue and taken decisive action. In France a ban on the use of neonicotinoids entered into effect in September 2018. Europe followed suit with a ban entering into effect in December 2018. We see no valid reason why Canada should continue to stall.

This is an issue of great concern to people in Canada. Close to half a million people in Canada have signed petitions and letters to Health Canada and the PMRA in support of a timely ban on neonicotinoids, since 2013.

The protracted delay in Canada's response to neonicotinoids will cause unnecessary environmental harm in Canada and also raises serious questions about the credibility and effectiveness of the government's pesticide assessment and decision-making process. We therefore request that you instruct the PMRA to finalize the imidacloprid re-evaluation decision without further delay, in early 2019, and proceed to cancel major uses, as proposed.

Sincerely yours,

² Sánchez-Bayo, F and Wyckhuys, K.A.G. 2019. Worldwide decline of the entomofauna: A review of its drivers. *Biological Conservation*, Volume 232, April 2019, Pages 8-27. Available at: <https://www.sciencedirect.com/science/article/pii/S0006320718313636>

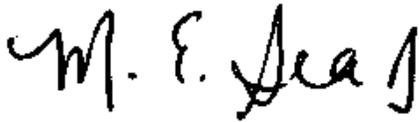
³ Food and Agriculture Organization. Pollinators vital to our food supply under threat. Available at: <http://www.fao.org/news/story/en/item/384726/icode/>



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